the full cost of the upgrade. The 1996 Act, however, places the duty to accommodate on the LEC. Therefore, while other telecommunications carriers seeking the additional attachments or occupancy should pay the cost of such additions, the payment among those carriers should be proportional to the percentage of newly available space each reserves for its use. If there are not enough telecommunications carriers to fill the additional space at the time the additions are built, however, the LEC must pay the remaining proportional shares of the cost of the upgrade; the LEC will be able to recover those costs from additional entities when they obtain attachments in the remaining spaces. See NPRM, ¶ 225.

Second, the Commission should require that utilities provide to telecommunications carriers promptly upon request their cable plats and conduit prints showing the nature and location of their poles, cables, and conduits. These documents are critically important for route planning in connection with offering service in new areas; the information they contain cannot be obtained from any other source, but can only be estimated, inaccurately and at considerable expense, from a competing LEC's field surveys. These documents also will permit carriers to make an independent determination of the nature and extent of the LEC's spare capacity, thereby providing an important check on its ability to assert false or exaggerated claims of insufficient capacity or impracticability. Notably, disclosure of such documents should not give rise to any legitimate security or privacy concerns, because carriers do not need access to the LEC's facility assignment records, which show which facilities are assigned to which customers.

C. The Commission Should Adopt Standards Implementing The Requirements Of Section 224(h) Concerning Owners' Modifications.

Section 224(h) sets forth standards that apply when the owner of a pathway seeks to modify or alter that pathway. The Commission has asked for comment on issues arising under Section 224(h), including the timing and manner of notice of such modifications and how to determine an entity's "proportionate share" of the costs of such additions. See NPRM, ¶ 225.

As to the timing and manner of notice, the Commission should distinguish between modifications to the structure itself (e.g., the pole, conduit, etc.) and modifications merely to the attachment.[17] If the utility plans to modify the structure itself, it should give 60 days' notice before beginning any work. Such notice is needed to ensure that attaching or occupying entities have sufficient time to determine whether they wish to make additional modifications and what those should be. If the utility is merely modifying the attachment itself (e.g., installing or replacing wires), the utility should be required to give 10 days' notice, which will permit an attaching entity to perform a site visit, assess the scope of work, and alert the utility to any concerns it may have.

As to the apportionment of costs for modifications, the Commission should clarify the limits of what the statute permits the LEC to charge. When a utility makes any Section 224(h) modification, the statute provides that other entities may take advantage of that

[17] "Attachment" means any wire, cable, facility or apparatus used for the transmission of communications, installed upon any pole, conduit or other pathway.

opportunity to "add to or modify" their own attachments or cable placement. Section 224(h) provides, however, that any entity that adds to or modifies its attachment or occupancy after receiving notification must pay only its "proportionate share" of the owner's cost "in making such pole, duct, conduit, or right-of-way accessible" (emphasis added). The Commission should clarify that this requirement applies only to the costs to the owner of making the pathway "accessible" for modification; the requirement does not require the attaching or occupying entities to pay the cost of the owner's modification. The Commission should also clarify that an entity's proportionate share is determined by its percentage of newly available space reserved for its use. Finally, the Commission should again make clear that the costs of making the pathway accessible must be offset by any potential future revenue the owner may obtain from having expanded its capacity to permit additional attachments or occupancy.

The Commission also should clarify that entities that do not make any modifications to their attachments bear no proportion of the cost of the owner's modification. Any more expansive reading of the "proportionate share" requirement would be contrary not only to Section 224(h) but to Section 224(i), which precludes an owner from charging attaching or occupying entities even for the cost of rearranging or replacing their own attachments or cable placements in the event of a modification sought only by the owner (or another attacher).

D. The Commission Also Should Adopt Rules In This Proceeding Requiring Tariffing And Imputation Of Pole Attachment and Cable Conduit Rates.

In the instant rulemaking, the Commission should also "implement" Section 224(g), and clarify that a utility's pole attachment rates (including rates for occupying conduit) must be tariffed and imputed to its local exchange rates.

In general, for telecommunications attachments, Congress has established two separate regimes to govern pole attachment rates, one for the first five years after enactment and another for the years thereafter. For the second period (beginning five years after enactment), pricing will be governed by future regulations promulgated pursuant to Section 224(e). The Commission has indicated its intent to promulgate these regulations in a separate rulemaking. See NPRM, ¶ 221 n.301; see also Section 224(e)(1) (regulations are to be promulgated within two years after enactment, to become effective five years after enactment).

In the first five years after enactment, however, pricing will be governed by Sections 224(b) and (d). Section 224(d) contains its own specific definition of what rates are "just and reasonable" for purposes of Section 224(b), applicable solely in the context of pole attachments. These provisions state that rates are just and reasonable if they assure recovery of not less than incremental cost nor more than fully distributed cost. See 47 U.S.C. § 224(d); see also Amendment of Rules and Policies Governing the Attachment of Cable Television Hardware to Utility Poles, 2 FCC Rcd. 4387, 4394 (¶ 53) (1987).

Although the Commission need not issue further regulations on Section 224(d) at this time, the Commission should adopt standards in this proceeding to implement Section 224(g). The nondiscrimination principle requires that a utility charge competing LECs the same rate that it charges itself for pole attachments. The most effective way to enforce this principle, as Congress realized, was to require such utilities to impute to its rates the amount "for which it would be liable under this section" for pole attachment rates. Moreover, tariffing of pole attachment rates is necessary for the effective enforcement of the imputation

requirement. Therefore, the Commission should require both the tariffing of rates and the imputation of those rates to local service.

IV. THE COMMISSION SHOULD ADOPT ITS PROPOSED RULES REQUIRING NOTICE OF TECHNICAL CHANGES.

Section 251(c)(5) of the 1996 Act requires that ILECs provide "reasonable public notice" of "changes in the information necessary for the transmission and routing of services" that use their facilities or networks, and of changes that would "affect the interoperability" of those facilities or networks. AT&T supports the Commission's proposed rules (¶¶ 189-194) to implement this requirement.

First, AT&T agrees with the Commission's proposal to define (¶ 189) "information necessary for transmission and routing" as "any information in the LEC's possession that affects interconnectors' performance or ability to provide services." AT&T also agrees with the proposal to define "interoperability" as "the ability of two or more facilities, or networks, to be connected, to exchange information, and to use the information that has been exchanged." These definitions appear to be sufficiently expansive to cover the categories of information for which Congress intended to require advance disclosure. Under these definitions, the public notice requirement would apply not only to interconnections between the network facilities themselves, but also to the electronic interfaces between ALECs and ILECs that are needed to support the ordering, provisioning, maintenance, and billing of the network facilities. Thus, if ILECs change the interfaces, data elements, or transaction types applicable to those functions, advanced public notice would be required.

Second, AT&T agrees with the conclusion (¶ 190) that ILECs should be required to disclose "all information relating to network design and technical standards, and

information concerning changes to the network that affect interconnection," including, at a minimum, the four facts identified in the NPRM.[18] That information should include, but not be limited to, all technical standards that are applicable to any new technologies or equipment, or that otherwise affect network interconnection.

Third, in addition to designating industry forums and industry publications as the principal means by which this information is disclosed (¶ 191), the Commission should also require ILECs to file with the Commission a statement noting that a change has been announced and identifying where the requisite detailed disclosure has been made. State commissions should consider requiring such filings as well. BOCs must make a more detailed filing, because they are required by Section 273(c)(1) to "maintain and file" with the Commission information relating to all "protocols and technical requirements" for connection to their facilities (including, but not limited to, planned changes in those requirements). See NPRM, ¶ 193.

Finally, AT&T agrees with the Commission's conclusion (¶ 192) that the timetable for disclosure established in Computer III should be applied to all ILECs for purposes of Section 251(c)(5). See NPRM, ¶ 192. ALECs need a reasonable time to learn about and adapt to ILEC network changes. The periods adopted in Computer III are familiar to ILECs and should provide the the advance information required by ALECs. A one year

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[18] Under the Commission's proposal, ILECs must provide notice of: (1) the date changes are to occur; (2) the location at which the changes will occur; (3) the type of changes; and (4) the potential impact of the changes.

minimum notice period should be required for changes to network elements or operations support system technology, however. Such is the minimum period required to reconfigure software, write new codes or make alternative arrangements that may be necessitated by the proposed change.

CONCLUSION

For all the reasons set forth above, the Commission should adopt the above-described rules.

Respectfully submitted,

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May 20, 1996

ATTACHMENT A

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of	)	
	)	CC Docket No. 92-237
Administration of the North American Numbering Plan	)	Phases One and Two
	)	

COMMENTS OF AT&T

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SUMMARY

Based on comments the Commission has received in this docket, it has released this Notice of Proposed Rulemaking ("NPRM") to address the future administration of the North American Numbering Plan ("NANP") and certain related numbering resource issues.

Significantly, the Commission correctly recognizes that requiring "1+" presubscription for interstate intraLATA toll calls would increase competition and thereby benefit consumers. Moreover, it would alleviate an unnecessary and anomalous inconsistency in the Commission's rules, which have long -- and very successfully -- mandated a presubscription scheme for other interstate calling. AT&T strongly urges the Commission to permit customers to choose their carrier for all interstate traffic, so that interstate intraLATA toll calls will also be routed to a customer's presubscribed carrier. The Commission should also direct that a nationwide, uniform 1+ ten-digit dialing plan be implemented for toll calling to provide customers with consistent, easy to understand dialing protocols for toll calls from anywhere in the country.

AT&T also supports the planned expansion of Carrier Identification Codes ("CIC") from three to four digits, and in particular, the Commission's recognition of the need for a significant transition period within which to accomplish this change. The Commission's proposed six-year transition period should serve as a minimum, however, with

the market determining if in fact a longer period is required.

Finally, AT&T fully supports the Commission's proposal to promptly establish a non-government entity to replace Bell Communications Research Corporation ("Bellcore") as the NANP Administrator ("NANPA"), a function Bellcore has performed since 1984. AT&T has actively participated in industry discussions of this issue for more than a year. As these comments show, the new NANP administration organization should consist of an Oversight Committee to develop and adopt major numbering policies, an NANPA that would functionally administer numbering resources under the guidance of the Oversight Committee, and an Industry Numbering Group that would include subcommittees responsible for technical support for specific numbering issues. In addition, a sponsor organization would provide logistical support and coordination, including secretarial services, for the numbering organization.

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of	)	
	)	CC Docket No. 92-237
Administration of the North American Numbering Plan	)	Phases One and Two
	)	

COMMENTS OF AT&T

AT&T Corp. ("AT&T") hereby submits its comments on the Notice of Proposed Rulemaking in CC Docket No. 92-237, released April 4, 1994.[1]

INTRODUCTION

The Commission opened this docket in October 1992 with a Notice of Inquiry ("NOI") to explore issues pertaining to the future administration of the North American Numbering Plan ("NANP").[2] Phase I of the NOI

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[1] In the Matter of Administration of the North American Numbering Plan, Notice of Proposed Rulemaking, CC Docket No. 92-237, FCC 94-79, released April 4, 1994 ("NPRM").

[2] In the Matter of Administration of the North American Numbering Plan, 7 FCC Rcd. 6837 (1992). Since 1984, Bell Communications Research Corporation ("Bellcore") has served as the NANP Administrator ("NANPA"). In this capacity, Bellcore administers the integrated numbering plan for World Zone 1 ("WZ1"), that covers the United States and seventeen other countries. The functions of the administrator include: assignment of numbering resources; monitoring the availability of these resources; and participation in industry, national and international standards bodies.

(footnote continued on following page)

addressed the identification of an appropriate entity to administer the NANP, how NANP administration should be funded in the future, and how administration of the NANP might be improved. Phase II of the NOI addressed the costs, benefits, and technical issues associated with expanding Feature Group D ("FG D") Carrier Identification Codes ("CICs") from a three-digit to a four-digit format.

Implicit in both the NOI and the NPRM is the correct recognition that, increasingly, customer and carrier access to, use of, and control over numbering resources and numbering or dialing plans could significantly affect the availability of competitive services to customers and the ability of service providers to compete. Now more than ever, it is thus critical that the administration of numbering resources, and decisions as to their use, be accomplished in as fair and procompetitive a manner as possible.

Consistent with the growing competitive significance of numbering issues, the NPRM has recognized (paras. 55-58) that the current lack of 1+ presubscription for interstate intraLATA toll traffic unnecessarily impairs competition for this traffic, and harms consumers by, for example, defeating customer expectations as to which carrier

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(footnote continued from previous page)

will be carrying the call. As shown below, requiring presubsription for all interstate intraLATA toll calls is a first step toward the introduction of meaningful competition in this market and should be implemented without any additional delay.

AT&T also supports implementation of the industry-developed CIC expansion plan (NPRM, para. 50). The NPRM recognizes (id.) that a transition period is necessary to permit subscribers to use both three- and four-digit FG D CICs, because a "flash cut" conversion of all network switches and customer equipment is not feasible. The six-year transition period proposed in the NPRM (para. 54), however, is the minimum period that would be appropriate and the Commission should ensure that the market can determine if a longer period is necessary.

Finally, AT&T agrees that the Commission should promptly establish a single, non-government entity to perform the NANP administrative function, subject to continuing Commission oversight (NPRM, paras. 11-18). As described below, in the last year the industry has made much progress in outlining the future structure of the organization that would be necessary to administer the NANP. These industry discussions provide an appropriate framework for the Commission's decisions here, and reaffirm the importance of impartial and equitable administration of critical numbering resources to help ensure the continued growth of competition in communications markets.

I. CUSTOMERS MUST BE PERMITTED TO CHOOSE THEIR CARRIER FOR ALL INTERSTATE TRAFFIC, INCLUDING INTRALATA.

As the NPRM correctly observes (para. 55), although customers have been able to choose, through presubscription, their preferred interexchange carriers for interstate interLATA calls, customers have been denied the ability to choose their carriers for interstate intraLATA toll calls. As a result, the incumbent LEC automatically retains and completes these interstate intraLATA calls, without regard to customers' choice of interexchange carrier. No reasoned argument can be made why these restrictions on customer choice for interstate intraLATA service should continue.

To the contrary, the current lack of 1+ presubscription for these calls creates an anomolous inconsistency with the existing Commission rule, which has long and successfully required presubscription for all other interstate calling. The results of this rule have been dramatic and substantial for customers and competitors alike. Requiring 1+ presubscription for interstate intraLATA toll calls would similarly provide the opportunity, for carriers that choose to offer such service, to compete more broadly than is currently possible. This increased competition could stimulate the entry of new carriers in certain markets. And as the Commission has repeatedly found, increased competition should result in

lower prices, higher quality services, and more choice for customers.[3]

The NPRM (para. 57) identifies a number of additional concerns with the current single-provider (LEC) system for intraLATA traffic. In addition to stifling competition, customers may be misled, thinking that by selecting an interexchange carrier, at a minimum, all of their interstate calls will be handled by that carrier. Not only will the call not be handled by the carrier the customer thought it chose, but it could well result in charges for the call "substantially higher than would have been charged if the call had been turned over to the customer's presubscribed interLATA IXC."[4]

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[3] Requiring presubscription for all intraLATA toll calls is an important first step to introduce effective competition in this business. To ensure full and fair competition, however, additional steps would also have to be taken, including, for example, requiring cost-based access rates and requiring that LECs impute to their rates for intraLATA toll service the same access charges that are imposed on other carriers. These other steps can and should be addressed promptly in Commission and state proceedings, but there is no reason not to take the critical first step now, by extending the presubscription rules to interstate intraLATA toll calls.

[4] NPRM, para. 57 (footnote omitted). And there should be no technological reason not to require intraLATA presubscription. For example, the software package required to update network switches manufactured by AT&T to implement FG D CIC expansion, which LECs are currently deploying, has available the software necessary to provide intraLATA presubscription.

In addition, the Commission requests comments on Ad Hoc's suggestion (NPRM, para. 43) that a nationwide uniform dialing plan be implemented for toll calling. Such a plan would be another important step toward more equal competition among carriers; and in fact, 43 states have already adopted 1+ ten-digit dialing for intraLATA, home NPA toll calls. The absence of a uniform dialing plan, in particular, potentially eliminating the digit "1" as a toll indicator, impairs customers' ability to distinguish between local and toll calls. See id. As a result, customers may inadvertently incur unintended toll charges.

Having the same 1+ ten-digit dialing plan for all toll calls would benefit all customers by providing a consistent, simple, easy to understand and remember method of dialing calls from anywhere in the country. Such 1+ ten-digit dialing would also simplify the operation of CPE features and functions, for example, toll restrictions. AT&T thus supports adopting a nationwide uniform 1+ ten-digit dialing plan for toll calling.[5]

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[5] The Commission should require uniform 1+ ten-digit dialing for all interstate toll calls, and should consider whether it can require such dialing for all intrastate toll calls as well on the basis of its plenary jurisdiction ("[t]elephone numbers are an indispensable part of the "facilities and regulations' for operating these 'through routes' of physical interconnection between carriers and are therefore subject to our plenary jurisdiction under the Act." NPRM, para. 8 (footnote omitted)).

II. THE MARKET SHOULD DETERMINE THE APPROPRIATE TRANSITION PERIOD FOR THE EXPANSION OF CIC CODES FROM THREE TO FOUR DIGITS.

The Commission has determined (NPRM, para. 50) that the planned expansion of CIC codes used for FG D access is reasonable and should be implemented as scheduled in the first half of 1995. The Commission also recognizes (id. at para. 54), however, that a sufficient transition period is required to "reduce -- even to the point of virtually eliminating -- the hardships imposed on pay phone providers, manufacturers, and PBX users." The Commission tentatively concludes (id.) that a six-year transition period would be appropriate.

In response to the NOI, commenters demonstrated why an extended transition period is required, well in excess of the 18-month period suggested by Bellcore, to accommodate required equipment modifications. For example, conversion to 101XXXX carrier access code dialing would be particularly complicated for private pay phone manufacturers and operators, requiring an extensive modification effort at significant cost.[6] As AT&T showed, many customers will have similar concerns regarding their customer premises equipment ("CPE").[7] Customers with PBXs, for example, would have to purchase and implement modifications (software and hardware)

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[6] Id. at para. 49.

[7] AT&T Reply Comments, CC Docket No. 92-237, Phase 2, filed January 27, 1993, p. 4 ("AT&T Reply").

to permit them to dial expanded CICs. AT&T estimates that the cost to its PBX customers would range up to $15,000 for each PBX to add the necessary modifications, depending on the type and age of the equipment. Based on previous customer buying behavior, it will take more than six-and-a-half years before all AT&T PBX users have CPE in place that will work with expanded CICs.[8] Given these facts, and the concerns expressed by customers, it would appear that a six-year transition period is the minimum acceptable, and the marketplace demand for additional CICs should ultimately determine the length of the necessary transition period.[9]

III. AN IMPARTIAL, WORLD ZONE 1 NUMBERING ORGANIZATION SHOULD BE ESTABLISHED PROMPTLY TO ADMINISTER THE NANP.

AT&T agrees fully with the Commission's tentative conclusion that an impartial, industry-driven entity should be established promptly to perform NANP administration. As the comments filed in response to the NOI confirmed,

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[8] As AT&T explained in its reply comments on the NOI (AT&T Reply, p. 4), unless there is extensive customer education about the need for CPE upgrades to accomodate CIC expansion, it could take longer to implement the necessary modifications.

[9] The current industry plan, which recognizes the need for a transition period, allows the assignment of 2000 four-digit codes while still permitting the use of existing 10XXX dialing for the users of networks assigned three-digit CICs. Thus, until all of the initial 2000 four-digit codes have been assigned, it would not be necessary to require 101XXXX dialing.

equitable administration of critical number resources will help ensure the continued introduction of competitively offered, innovative new services, and will provide a further stimulus for the continued growth of healthy competition.

Since the NOI, Bellcore has notified the Commission "that it desires to relinquish administration of the NANP,"[10] and more significantly, the industry -- through the Future of Numbering Forum ("FNF") -- has reached consensus on a number of questions concerning NANP administration. As the NPRM recognizes (para. 6 n.9), the FNF was established to consider Bellcore's 1992 proposal on the future of numbering in World Zone 1. Since its first meeting in March of 1993 (open to all industry participants and attended by representatives from a broad cross-section of the telecommunications industry), the FNF focused primarily on the future organization and structure of NANP planning and administration. Through copies of the minutes of the FNF meetings, FNF has kept the Commission informed of the progress that has been made in defining NANP administration after Bellcore.

AT&T supports the agreement reached at FNF that a World Zone 1 Numbering Organization ("WZ1NO") should be established. AT&T believes this organization should be composed of three components (see Appendix 1), which in

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[10] NPRM, para. 6.

combination would perform all of the functions necessary to administer the NANP, with autonomy where appropriate to avoid claims of bias in the administration of critical numbering resources. Specifically, WZ1NO would consist of: (i) a NANP administrator that would be responsible for administering number assignments in accordance with specific guidelines and directives of an Oversight Committee;[11] (ii) the Oversight Committee, which would be an industry body open to all interested private and government parties, to develop and adopt major numbering policies;[12] and (iii) the ING, which includes a number of subcommittees that would provide technical support and resolve questions concerning the use of and guidelines for discrete numbering resources. In addition, a "sponsor" organization would be responsible for providing logistical support and coordination, and secretarial services for the numbering organization.[13]

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[11] Central Office ("CO") code assignment functions should also be centralized within the NANP administrator, as suggested in the NPRM (para. 29).

[12] For example, policies that are highly contentious or those that would be precedent setting. In developing these policies, the Oversight Committee would be supported by the Industry Numbering Group ("ING").

[13] The Alliance for Telecommunications Industry Solutions ("ATIS") has volunteered to perform this role and FNF agreed that it would be a suitable party to perform these functions.

There was also general agreement within FNF, and AT&T therefore urges, that the Oversight Committee should rely on consensus to arrive at decisions. There was extensive discussion within FNF that in the absence of consensus, an intermediate alternative dispute resolution ("ADR") process could be employed before the Commission is called on to resolve disputes. Under the new, open WZ1NO, with participation by the Commission and other regulatory bodies, AT&T believes it is likely consensus may be achieved more easily than it has been in some existing industry groups.

Nonetheless, it would be appropriate to identify an ADR process that could be used before disputes are brought to the Commission. Although the Commission's current ADR process may not be appropriate to resolve certain policy questions,[14] in those situations, other ADR processes could be appropriate. ADR would be appropriate, for example, where the Oversight Committee has successfully narrowed the issues to a choice between two alternatives, where two distinct parties or industry groups are unable to resolve a particular disagreement, or where implementation disputes arise that require expedited resolution. WZ1NO

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[14] See, e.g., In the Matter of Use of Alternate Dispute Resolution Procedures in Commission Proceedings and Proceedings in which the Commission is a Party, 6 FCC Rcd. 5669, 5671 (1991); 7 FCC Rcd. 4679 (1992).

should establish guidelines requiring that if the Oversight Committee is unable to reach consensus in a certain amount of time (e.g., six months), the issue would be presented to an arbitrator for decision. Ultimately, all parties could continue to address concerns directly to the Commission, through a complaint proceeding or otherwise.[15]

With respect to funding for the WZ1NO, AT&T generally supports the principles that were identified by the FNF funding subgroup.[16] Appropriate principles include:

- All users of NANP resources should share in the funding of the WZ1NO, uniformly and without discrimination.
- The cost of administering the funding mechanism should not outweigh the benefit of any funding method.
- The funding mechanism should continue to support the current integrated WZ1 structure.
- If funding is mandatory, a penalty should apply for non-payment.

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[15] NPRM, para. 25.

[16] In addition, after discussion that included input from Bellcore on current staffing requirements, an estimated first year budget of $2 million to administer the NANP was proposed at the fourth meeting of the FNF.

- Funding must be sufficient to support an appropriately staffed and qualified NANP administrator.
- The method of funding should consider the manner in which costs are generated (e.g., recurring and nonrecurring).
- The funding method should encourage efficient and effective use of numbering resources.
- The funding method should be incentive neutral to the WZ1NO.
- Members who participate in WZ1NO meetings should bear the costs of their participation, as they do today at industry forums.

AT&T would not object to having the National Exchange Carrier Association ("NECA") perform the function of implementing the funding mechanism, given its current experience managing industry-wide support funds (e.g., Universal Service Fund, Lifeline Assistance, Telecommunications Relay Services ("TRS")).[17] It would not

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[17] To the extent that a wide spectrum of industry participants contributes to an existing fund (e.g., TRS), such a fund might provide an appropriate vehicle for NANP administration funding. Further, if such a fund currently contained surpluses, it may be appropriate to use such surpluses to finance number administration. This would be particularly true if the required funding is such that it could reasonably be covered by such surpluses. This would obviate the need to create an entirely new funding mechanism and the administrative infrastructure required for its implementation.